

State Water Resources Control Board

March 3, 2017

(Via email and Certified Mail)

CERTIFIED MAIL

NO. 7015 1520 0001 7928 3676

Mr. Mike Chambless
Assistant City Manager
City of Hollister
375 Fifth Street
Hollister, California 95023
mike.chambless@hollister.ca.gov

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT THE HOLLISTER MUNICIPAL AIRPORT, GAVALIN AVIATION,
200 SKYLANE DRIVE, HOLLISTER**

Dear Mr. Chambless:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on February 22, 2017 pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Site Map – Site map does not contain location of product piping.	All	February 22, 2017	Ongoing	23 CCR 2711(a)(8)
2	Failure to Maintain Financial Responsibility On-Site – Documents observed at the time of inspection reflected the operator Gavalin Aviation, as maintaining financial responsibility. However, the owner, City of Hollister, should be maintaining financial responsibility. The letter from the Chief Financial Officer (CFO) was expired and not signed by the CFO. Additionally the asset and liability amounts must be updated.	All	February 22, 2017	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Maintain Tank Information (Form B) – Tank information forms list the tank manufacturer as McClary; however, Modern Welding tanks were observed at the time of inspection. Tank information forms indicated that no overfill protection valves exist; however, flapper valves were observed at the time of inspection. The Fill Components Installed section needs to be updated to indicate “yes” for Striker Plate/Bottom Protector and “yes” for Containment Sump. The Corrosion Protection section needs to be updated to indicate “yes” for Isolation.	All	February 22, 2017	Ongoing	23 CCR 2711(a)
4	Failure to Monitor Product Piping – Sensors in the jet fuel and aviation gas turbine sumps were unable to detect a leak at the earliest opportunity because they were not placed in the lowest point of the sumps.	All	February 22, 2017	Ongoing	23 CCR 2630(d)
5	Failure to Install Line Leak Detectors (LLD) According to Manufacturer’s Instructions – The Vaporless Manufacturing Inc. LLD vent tubes are required to be stainless steel for jet fuel and aviation gas.	All	February 22, 2017	Ongoing	23 CCR 2638(a)
6	Failure to Maintain Secondary Containment – The secondary containment test conducted on September 12, 2014 indicated a failure of the secondary piping run. No repair or retest documents were observed at the time of inspection.	Tank 1	September 12, 2014	Ongoing	H&SC 25291(a)(2)
7	Failure to Maintain UST Monitoring System – Previous annual monitoring certifications indicate that the visual alarm is not operational.	All	June 26, 2012	Ongoing	H&SC 25291(b); 23 CCR 2630 (d)

No.	Violation	Tank	Start Date	Stop Date	Regulation
8	Failure to Maintain Monitoring Plan - Monitoring plan indicates that under dispenser containment is monitored by Leak Alert, however float and chain was observed at the time of inspection. The monitoring plan in CERS indicates "yes" for leak alarm triggers automatic pump shutdown, however it should indicate "no".	All	February 22, 2017	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1), 2634(a),(b),(c) and(d)
9	Failure to Use Approved Monitoring Sensor – Leak Alert sensors located in turbine sumps are not approved for use with any aviation fuel.	All	February 22, 2017	Ongoing	23 CCR 2630(d)
10	Failure to Perform Product Line Integrity Test – This facility does not have fail safe and positive shut down therefore it must perform an annual 0.1 gallon per hour line integrity test.	All	February 22, 2012	Ongoing	23 CCR 2636(f)(4)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and San Benito County Health Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance. Additionally, please have your service contractor clean all debris from the under dispenser containment and ensure all electrical wiring inside the turbine sumps is intrinsically safe and installed according to code.

Please send all compliance documentation to the following:

State Water Board

Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, 23rd Floor
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Mrs. Olga Vargas
Environmental Health Specialist III
San Benito County Health Department
1111 San Felipe Road, Suite 102
Hollister CA, 95023
ovargas@cosb.us

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amantha Henkel". The signature is fluid and cursive, with the first name "Amantha" and last name "Henkel" clearly distinguishable.

Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. David Leonardo
President, Gavilan Aviation
200 Skylane Dr.
Hollister, California 95023
flygavilan@aol.com

Mrs. Teresa Leonardo
Secretary, Gavilan Aviation
hollisterjetcenter@gmail.com

Mrs. Olga Vargas
Environmental Health Specialist III
San Benito County Health Department
ovargas@cosb.us